

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MICHAEL PRIDGEN

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CR. NO. 04-10375-RWZ

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The United States of America submits this Request for Jury Voir Dire. The government respectfully requests that the Court, in addition to its normal practice, query the prospective jurors regarding the following:

1. Have you ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?
2. Have you every had any involvement, of any sort, with the Boston Police?
3. Have you, any member of your immediate family, or any close friend ever been involved in a criminal proceeding?
4. Have you, any member of your immediate family, or any close friend ever filed a claim or lawsuit against the United States or any of its agencies, or answered a claim or lawsuit filed by the federal government?
5. Are you aware of any beliefs or feelings that you may have regarding the government that would in any way interfere with your ability to evaluate and judge fairly and impartially the facts of this case?

6. Some of the witnesses expected to be called by the United States at trial are law enforcement officers from or connected with the Boston Police Department, and the Bureau of Alcohol Tobacco and Firearms and Explosives. These witnesses may be called to testify as both "fact" witnesses and as "expert" witnesses. As experts, they will be called to give their expert opinion as to certain matters in this case calling for specialized knowledge and skill, such as the place of manufacture of firearms and ammunition. Are you aware of any beliefs or feelings that you may have regarding such witnesses that would in any way interfere with your ability to evaluate and judge fairly and impartially their testimony or the facts of this case?

7. Have you, any member of your immediate family, or any close friend ever been the victim of a crime involving firearms?

8. Do you have any beliefs or views about firearms in general that would interfere with your ability to apply those laws as I explain them to you?

9. Are you aware of any other beliefs or feelings that would prevent you from completely and honestly applying the law, as I give it to you at the end of the case, to the facts as you find them?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Donald L. Cabell
DONALD L. CABELL
Assistant U.S. Attorney